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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF STEVEN S.  
SCHULTE IN SUPPORT OF  
NACHAWATI LAW GROUP  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, AND RASIER-CA,  
LLC'S MOTION TO DISMISS CASES  
FOR FAILURE TO COMPLY WITH PTO  
31 AND SHOW-CAUSE ORDERS**

This Document Relates to:

*Jane Doe T.W. v. Uber Technologies, Inc., et al.,  
No. 3:24-cv-00559-CRB*

*Jane Doe J.R. v. Uber Technologies, Inc., et al.,  
No. 3:24-cv-00574-CRB*

*Jane Doe (L.R.) v. Uber Technologies, Inc., et  
al., No. 3:24-cv-04306-CRB*

*Jane Doe (A.R.) v. Uber Technologies, Inc., et  
al., No. 3:24-cv-04313-CRB*

*Jane Doe (D.H.) v. Uber Technologies, Inc., et  
al., No. 3:24-cv-04322-CRB*

*Jane Doe (K.H.) v. Uber Technologies, Inc., et  
al., No. 3:24-cv-04326-CRB*

Judge: Honorable Charles R. Breyer  
Date: January 16, 2026  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

1 *Jane Doe (Y.E.) v. Uber Technologies, Inc., et*  
2 *al., No. 3:24-cv-04330-CRB*

3 *Jane Doe (S.G.) v. Uber Technologies, Inc., et*  
4 *al., No. 3:24-cv-04353-CRB*

5 *Jane Doe (K.C.) v. Uber Technologies, Inc., et*  
6 *al., No. 3:24-cv-04354-CRB*

7 *Jane Doe (T.W.) v. Uber Technologies, Inc., et*  
8 *al., No. 3:24-cv-04356-CRB*

9 *Jane Doe (S.W.) v. Uber Technologies, Inc., et*  
10 *al., No. 3:24-cv-04360-CRB*

11 *Jane Doe (S.W.) v. Uber Technologies, Inc., et*  
12 *al., No. 3:24-cv-04364-CRB*

13 *Jane Doe (E.N.) v. Uber Technologies, Inc., et*  
14 *al., No. 3:24-cv-04370-CRB*

15 *Jane Doe E.B. v. Uber Technologies, Inc., et al.,*  
16 *No. 3:24-cv-05110-CRB*

17 *Jane Doe L.B. v. Uber Technologies, Inc., et al.,*  
18 *No. 3:24-cv-05115-CRB*

19 *Jane Doe A.E. v. Uber Technologies, Inc., et al.,*  
20 *No. 3:24-cv-05121-CRB*

21 *Jane Doe D.G. v. Uber Technologies, Inc., et al.,*  
22 *No. 3:24-cv-05169-CRB*

23 *Jane Doe C.H. v. Uber Technologies, Inc., et al.,*  
24 *No. 3:24-cv-05340-CRB*

25 *Jane Doe J.J. v. Uber Technologies, Inc., et al.,*  
26 *No. 3:24-cv-05343-CRB*

27 *Jane Doe S.K. v. Uber Technologies, Inc., et al.,*  
28 *No. 3:24-cv-05710-CRB*

*Jane Doe (C.M.) v. Uber Technologies, Inc., et*  
*al., No. 3:24-cv-05718-CRB*

*Jane Doe T.M. v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05764-CRB*

*Jane Doe K.M. v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05796-CRB*

*Jane Doe E.P. v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05946-CRB*

*Jane Doe A.R. v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05947-CRB*

*John Doe (C.S.) v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-05964-CRB*

*Jane Doe E.W. v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-06073-CRB*

*Jane Doe S.S. v. Uber Technologies, Inc., et al.,*  
*No. 3:24-cv-06076-CRB*

*NLG (A.B.) v. Uber Technologies, Inc., et al., No.*  
*3:25-cv-01711-CRB*

*NLG (M.G.) v. Uber Technologies, Inc., et al., No.*  
*3:25-cv-01714-CRB*

*NLG (M.L.P.) v. Uber Technologies, Inc., et al.,*  
*No. 3:25-cv-01717-CRB*

*NLG (ZD) v. Uber Technologies, Inc., et al., No.*  
*3:25-cv-01729-CRB*

*Jane Doe NLG (KS) v. Uber Technologies, Inc., et*  
*al., No. 3:25-cv-02616-CRB*

*Jane Doe NLG (KM) v. Uber Technologies, Inc.,*  
*et al., No. 3:25-cv-02706-CRB*

*NLG (BC) v. Uber Technologies, Inc., et al., No.*  
*3:25-cv-02899-CRB*

*NLG (JH) v. Uber Technologies, Inc., et al., No.*  
*3:25-cv-02949-CRB*

*Jane Doe NLG (KM) v. Uber Technologies, Inc.,*  
*et al., No. 3:25-cv-02956-CRB*

1 *Jane Doe NLG (SB) v. Uber Technologies, Inc., et*  
2 *al., No. 3:25-cv-02973-CRB*

3 *NLG (MH) v. Uber Technologies, Inc., et al., No.*  
4 *3:25-cv-05163-CRB*

5 *NLG (R.G.) v. Uber Technologies, Inc., et al., No.*  
6 *3:25-cv-05776-CRB*

7 *NLG (LL) v. Uber Technologies, Inc., et al., No.*  
8 *3:25-cv-05865-CRB*

9 *NLG (NM) v. Uber Technologies, Inc., et al., No.*  
10 *3:25-cv-05867-CRB*

11 *NLG (KF) v. Uber Technologies, Inc., et al., No.*  
12 *3:25-cv-06031-CRB*

13 *Jane Doe CH v. Uber Technologies, Inc., et al.,*  
14 *No. 3:24-cv-04363-CRB*

15 *Jane Doe NLG JV v. Uber Technologies, Inc., et*  
16 *al., No. 3:24-cv-08622-CRB*

17 *Jane Doe NLG BH v. Uber Technologies, Inc., et*  
18 *al., No. 3:25-cv-00369-CRB*

19 *Jane Doe NLG AB v. Uber Technologies, Inc., et*  
20 *al., No. 3:25-cv-01079-CRB*

21 **DECLARATION OF STEVEN S. SCHULTE**

22 I, Steven S. Schulte, declare as follows:

- 23 1. I am an attorney who is admitted *pro hac vice* to practice before this Court. I am a  
24 partner at the law firm Nachawati Law Group and counsel of record for the plaintiffs  
25 represented by Nachawati Law Group whose claims are the subject of Defendants'  
26 Motion to Dismiss. ECF No. 4456.  
27 2. I make this declaration of my personal knowledge. If called as a witness, I could and  
28 would competently testify to the matters set forth herein.

3. This declaration is made in support of Nachawati Law Group Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Cases for Failure to Comply with PTO 31 and Show-Cause Orders. ECF No. 4456.

4. Despite significant efforts, including numerous phone calls, emails, texts, written letters, and address searches, our office has been unsuccessful in connecting with certain Plaintiffs as to the verified statement of explanation that is the subject of Defendants' Motion.

5. Plaintiffs Jane Doe LR, Jane Doe NLG (RG), Jane Doe NLG (NM), Jane Doe KC have submitted and produced verified statements of explanation as required by Pretrial Order No. 31 (“PTO 31”), as of December 5, 2025. Counsel would therefore dispute their inclusion on Uber’s list of delinquencies, provided in their Motion, as well as respectfully request for their exclusion on any future entry of dismissal by the Court.

6. On December 5, 2025, Plaintiff Jane Doe NLG SB produced a bona fide ride receipt and a statement verifying under penalty of perjury that it is a bona fide ride receipt relating to the Uber trip relating to the allegations contained in Plaintiff's complaint, and thus, compliance with PTO 31 has been satisfied.

Executed on December 5, 2025, in Dallas, Texas.

**NACHAWATI LAW GROUP**

/s/ Steven S. Schulte

Steven S. Schulte (TX SBN 24051306)